

REMARKS

Applicant respectfully requests reconsideration of this application.

The rejection under 35 U.S.C. §102 must be withdrawn.

Applicant respectfully traverses the rejection of claims 1-4, 6, 8, 10, 12-16, 18, 19 and 21 under 35 U.S.C. §102(b) as being anticipated by the *Luigi* reference. There is no *prima facie* case of anticipation.

First, there is no inner side of the timing belt 5 that engages a drive member. The drive member 16 in the *Luigi* reference engages the outer side of the timing belt 5 by driving and engaging the outer side teeth 12. Therefore, the reference does not establish a *prima facie* case of anticipation.

Further, there is no teaching within the reference that the teeth 12 are pliable. They have to be rigid in order to provide a driving engagement between the timing belt 5 and the conveyor belt 2. It is an unreasonable interpretation of the reference to suggest that the entire teeth 12 are pliable. It is further unreasonable to assume that a portion of the teeth 12 are pliable. Therefore, there is no *prima facie* case of anticipation. The Examiner cannot just assume a feature of the reference that is in no way taught or suggested by the reference. The Examiner's interpretation of the teeth 12 as being pliable would render the arrangement unworkable.

Additionally, many of Applicant's dependent claims have features that are in no way shown or in any way derivable from the teachings of the *Luigi* reference including Figure 2, which shows the most detail of the timing belt 5. There is no basis for a *prima facie* case of anticipation against any of Applicant's claims and the rejection under 35 U.S.C. §102 must be withdrawn.

The rejection under 35 U.S.C. §103 must be withdrawn.

Applicant respectfully traverses the rejection of claims 9 and 23-26 under 35 U.S.C. §103 based upon the proposed combination of the *Luigi* and *Mol* references. As described above, the *Luigi* reference does not teach what the Examiner suggests. Further, even if one were to include urethane from the *Mol* reference into the arrangement of the *Luigi* reference, that urethane would have to be designed to be rigid enough so that the teeth 12 would not be pliable or they would not be able to sufficiently drive the conveyor belt 2.

Additionally, the Examiner's interpretation of the metal core of the belt as a "base" of a tooth is not consistent with the reference. The metal core is not any part of any of the teeth. The teeth 12 are made of the plastic material alone according to the *Luigi* reference. Therefore, the assertion that the metal core comprises a base of a tooth is not consistent with the teachings of the reference.

There is no *prima facie* case of obviousness against any of Applicant's claims. The rejection must be withdrawn.

Conclusion

Applicant respectfully submits that this case is in condition for allowance.

Respectfully submitted,

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